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DATE: April 8, 1991 REF: RFEV24-SAG-EGRF-T-053
TO: Olga Erlich LOCATION: EG&G RF
FROM: Larry McInroy/Phil Ralphs ^{LM} ^{PR} LOCATION: SAIC/Golden

SUBJECT: Response to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) Review Comments on the Draft Site-Wide Treatability Studies Plan

In response to your request, please find attached our responses to the EPA and CDH review comments on the subject document that pertain to quality assurance. A hand-written response to these comments was faxed to you earlier. If you have any questions regarding these responses, please contact us at 279-7242

APPROVED
EBASCO

4/23/91
DATE.

cc T Greengard
M Brooks

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ADMIN RECORD

ROCKY FLATS ENVIRONMENTAL RESTORATION PROGRAM REVIEW/COMMENT RESOLUTION FORM

Document No and Title Draft Site-Wide Treatability Studies Plan

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Reviewer Name(s) Environmental Protection Agency and Colorado Department of Health

Date 4/8/91

REVIEWER'S COMMENTS		RESPONSE
COMMENT NO	PAGE NO	DISCUSSION
1	1	<p>All treatability tests will be performed within the SOP/QAPP framework</p> <p>Section 6.2.1.1 now explains the relationship between the site-wide QAPP and TSP-specific QAAs. QAAs will reference the applicable SOPs and any SOPs that will be adhered to during the conduct of the treatability studies.</p>
2	2	<p>The goal of treatability studies, as will be stated in individual TSPs, is to evaluate a particular technology's capability to reduce contaminants and to determine whether the treatment may have undesirable effects. The removal efficiency of the technology will be based on established criteria including established background levels and ARARs, both of which are presented and discussed in TSPs. Data quality objectives will be established in the Quality Assurance Addenda that will be developed for each TSP. The relationship between the QAPP and QAAs is explained in Section 6.2.1.1. The content of the QAPP and QAAs is also now summarized in this section.</p>
3	2	<p>A Quality Assurance Addendum to the Site-Wide Quality Assurance Project Plan (QAPP) will be developed for each individual Treatability Study Plan (TSP). DQOs have been established and are presented in the QAPP. However, it is more appropriate to establish DQOs on a site-and/or investigation-specific basis, based on the site specific characteristics and data need of the investigation. Therefore, DQOs will be developed for each TSP and presented in the QAA that is developed for that particular TSP. The DQOs will establish acceptable measurements for accuracy, precision, comparability, representativeness, and completeness.</p>

ROCKY FLATS ENVIRONMENTAL RESTORATION PROGRAM REVIEW/COMMENT RESOLUTION FORM

Document No and Title Draft Site-Wide Treatability Studies Plan Page 2 of 2

Reviewer Name(s) Environmental Protection Agency and Colorado Department of Health Date 4/8/91

REVIEWER'S COMMENTS		RESPONSE
COMMENT NO	PAGE NO	DISCUSSION
4	3	<p>Section 3.0, page 3-2 Any specific field or quality assurance activities required to conduct the treatability studies should be incorporated by the use of mechanism that does not require modification of the Site Wide Sampling and Analysis Plan (SAP) or the Site-Wide Quality Assurance Project Plan (QAPJ), since these are generic documents. One way to do this, is to include the required <u>addenda</u> within the treatability study work plans and then incorporate them into the Site-Wide SAP and QAPJ by reference</p> <p>The FSP and QAPJ are not conducted within the site-wide treatability studies program and they should not be modified to meet the needs of each treatability study</p> <p>The meaning of the third item in the dot-list is not clear, since the documents referred to are not "conducted Within" the subject program. The final, and overall, objective is to prepare a comprehensive Site-Wide Treatability Study report for use as a basic reference document in the completion of Feasibility Studies</p>
5	6	<p>Section 6.1, page 6-1 FSP and QA/QC procedures specific to the treatability studies to be conducted must be included in the treatability studies work plan and as agenda to the generic FSP and QA/QC procedures</p> <p>EG&G Standard Operating Procedures (SOPs) for IAG required activities have been submitted to EPA and CDH for review and approval. These SOPs and the QAPJ together comprise the SAP required by the IAG. The SOPs include field sampling procedures and appropriate QA/QC procedures. Additional QA/QC controls are included in the QAPJ. Where the implementation of a treatability study requires the use of an SOP or QA/QC control described in the QAPJ, the specific SOP or QAPJ will be referenced, but not included, in either the work plan or the Quality Assurance Addendum, or both. Any sampling or QA/QC procedures that are specific to the treatability study will be included in the Work Plan</p>